



University of Hawaii at Manoa

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November 30, 1989
RP:0118

Mr. Steven Y.K. Chang
Environmental Management Division
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Mr. Chang:

National Pollutant Discharge Elimination System Permit
Coal-Fired Cogeneration Facility
Campbell Industrial Park, Ewa, Oahu

We have conducted a brief review of the above cited permit application with the assistance of Carolyn Cook of the Environmental Center. AES Barbers Point, Inc. requests permission to discharge storm runoff from their material storage area into the Pacific Ocean through Outfall Serial Nos. 001 and 002.

It is our understanding that any discharges from this facility are subject to all EPA requirements for coal fired generation plants and that all runoff from the material storage area will be directed to a settling basin. Furthermore, discharges from the settling basin will only occur from rainfall in excess of a 10-year, 24-hour rainfall event.

We suggest that a sufficient number of water samples at the point of potential discharge from the settling basin be taken to establish a baseline of ambient water quality conditions at the discharge point. Parameters of particular interest would include pH and suspended solids. This would provide a baseline against which the significance of subsequent discharges can be judged should the need arise.

We appreciate the opportunity to provide comments on the permit application.

Yours truly,

Jacquelin N. Miller
Associate Environmental Coordinator

cc: L. Stephen Lau
Perry White
Anders Daniels
John Burgess
Tom Giambelluca
Carolyn Cook